

The Honorable James L. Robart

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

MACHELL SHERLES, Successor Executor  
and Trustee in the Estate of Ann R. Rule, King  
County , Washington Probate Cause No. 15-4-  
04420-3 KNT

**Plaintiff.**

v

**FOLEY AGENCY, Inc. et al.**

**Defendants.**

No. 2:18-cv-00016-JLR

[PROPOSED] STIPULATED ORDER  
GRANTING STIPULATED MOTION  
TO EXTEND DEADLINES FOR  
DEFENDANTS' ANSWERS, INITIAL  
DISCLOSURES & COMBINED  
JOINT STATUS REPORT AND  
DISCOVERY PLAN

**(Clerk's Action Required)**

All parties to this action, consisting of Plaintiff, **Machell Sherles**, the Successor Executor and Trustee of the Rule Estate; and the Defendants, **Foley Agency, Inc.**, a New York corporation, and **JoAnn Fox**, a married individual, via their Stipulated Motion to Extend Deadlines for Defendants' Answers, Initial Disclosures & Combined Joint Status Report and Discovery Plan ("Motion") stipulate to the entry of this Stipulated Order

[PROPOSED] STIPULATED ORDER GRANTING  
STIPULATED MOTION TO EXTEND DEADLINES  
FOR DEFENDANTS' ANSWERS, INITIAL  
DISCLOSURES & COMBINED JOINT STATUS  
REPORT AND DISCOVERY PLAN - 1

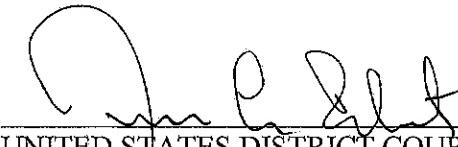
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Facsimile: (206) 282-2707

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Granting Stipulated Motion to Extend Deadlines for Defendants' Answers, Initial  
4 Disclosures & Combined Joint Status Report and Discovery Plan ("Order").  
6

8 THEREFORE, IT IS SO ORDERED, ADJUDGED AND DECREED as follows:  
10

12 By agreement of the parties and for good cause shown, the deadline for Defendants'  
14 Answers shall be March 28, 2018, the deadline for FRCP 26(a)(1) Initial Disclosures shall  
16 be May 7, 2018, and the deadline for FRCP 26(f) and Local Civil Rule 26(f) Combined  
Joint Status Report and Discovery Plan shall be May 14, 2018. *No further extensions will be granted.*  
18

20 SO ORDERED, this 27 day of February, 2018.  
22

24   
26 UNITED STATES DISTRICT COURT JUDGE

28 **SO STIPULATED AND AGREED:**

30 DATED this 27<sup>th</sup> day of February, 2018. DATED this 27<sup>th</sup> day of February, 2018.

32 **Counsel for Plaintiff.**

34 LYNCH & FOLEY PC

**Counsel for Defendants.**

COOK & BARTLETT, PLLC

40 s/ Rex B. Stratton  
42 Rex B. Stratton, III, WSBA #1913; VBA #5683  
44 Attorney for Plaintiff  
46 7 Washington Street  
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40 /s/ Diana S. Hill  
42 Diana S. Hill, WSBA #36610  
44 Attorney for Defendants Foley Agency, Inc.  
46 and JoAnn Fox  
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54 [PROPOSED] STIPULATED ORDER GRANTING  
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FOR DEFENDANTS' ANSWERS, INITIAL  
DISCLOSURES & COMBINED JOINT STATUS  
REPORT AND DISCOVERY PLAN - 2

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4 **Certificate of Service**  
6

8 I hereby certify that on February 27, 2018, I electronically filed the foregoing with  
10 the Clerk of the Court using the CM/ECF system which will send notification of such filing  
to the following counsel of record for Plaintiff:

12 Rex B. Stratton, III  
14 Lynch & Foley PC  
16 7 Washington Street  
Middlebury, VT 05753  
[rstratton@lynchandfoley.com](mailto:rstratton@lynchandfoley.com)

18 This 27<sup>th</sup> day of February, 2018 at Seattle, Washington.  
20

22 /s/ Diana S. Hill  
24

26 Diana S. Hill  
28 Cook & Bartlett, PLLC  
30 1900 W. Nickerson St., Ste. 215  
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32  
34 [PROPOSED] STIPULATED ORDER GRANTING  
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40 DISCLOSURES & COMBINED JOINT STATUS  
42 REPORT AND DISCOVERY PLAN - 3  
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